



**FEDERAL ELECTION COMMISSION**  
**Washington, DC 20463**

Jane Leiderman, Treasurer  
Applegate for Congress  
16633 Ventura Blvd., #1008  
Encino, CA 91436

**JUN - 5 2018**

**RE: MUR 7223 / RR 17L-23**  
Applegate for Congress and Jane Leiderman  
in her official capacity as treasurer  
Douglas L. Applegate

Dear Ms. Leiderman:

On May 30, 2018, the Federal Election Commission ("Commission") accepted the signed conciliation agreement submitted on behalf of Applegate for Congress and you in your official capacity as treasurer (the "Committee"), in settlement of a violation of 52 U.S.C. § 30104(b), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter.

Documents related to the case will be placed on the public record within 30 days. See Disclosure of Certain Documents in Enforcement and Other Matters, 81 Fed. Reg. 50,702 (Aug. 2, 2016). Information derived in connection with any conciliation attempt will not become public without the written consent of the Committee and the Commission. See 52 U.S.C. § 30109(a)(4)(B).

Enclosed you will find a copy of the fully executed conciliation agreement for your files. Please note that the civil penalty is due within 45 days of the conciliation agreement's effective date. If you have any questions, please contact me at (202) 694-1650.

Sincerely,

A handwritten signature in black ink, appearing to read "Saurav Ghosh".

Saurav Ghosh  
Attorney

Enclosure  
Signed Conciliation Agreement

**BEFORE THE FEDERAL ELECTION COMMISSION**

In the matter of )  
 )  
 Applegate for Congress and ) MUR 7223  
 Jane Leiderman in her official )  
 capacity as treasurer )  
 )

**CONCILIATION AGREEMENT**

This matter was generated by a complaint filed by James V. Lacy and also based on information ascertained by the Federal Election Commission ("Commission") in the normal course of carrying out its supervisory responsibilities, *see* 52 U.S.C. §§ 30109(a)(1), (a)(2). The Commission found reason to believe that Applegate for Congress and Jane Leiderman in her official capacity as treasurer ("AFC") violated 52 U.S.C. § 30104(b).

NOW, THEREFORE, the Commission and AFC, having participated in informal methods of conciliation, prior to a finding of probable cause to believe, do hereby agree as follows:

- I. The Commission has jurisdiction over AFC and the subject matter of this proceeding, and this agreement has the effect of an agreement entered pursuant to 52 U.S.C. § 30109(a)(4)(A)(i).
- II. AFC has had a reasonable opportunity to demonstrate that no action should be taken in this matter.
- III. AFC enters voluntarily into this agreement with the Commission.
- IV. The pertinent facts in this matter are as follows:
  1. Applegate for Congress was the principal campaign committee for Douglas L. Applegate, a federal candidate in California's 49th Congressional District during the 2016

election cycle. Jennifer May was the Committee's treasurer of record at the time of the violations set forth herein. Jane Leiderman became the Committee's treasurer of record as of June 1, 2017, and is named in this agreement only "in her official capacity" as the current treasurer.

2. At the relevant times, the Federal Election Campaign Act of 1971, as amended ("Act"), required political committee treasurers to file reports of receipts and disbursements in accordance with the provisions of 52 U.S.C. § 30104. These reports must include the amount and nature of these receipts and disbursements. 52 U.S.C. § 30104(b)(2), (4).

3. AFC filed its 2016 12-Day Pre-General Election Report on October 27, 2016, reporting total disbursements of \$350,241. AFC 2016 12-Day Pre-General Election Rpt. at 2 (Oct. 27, 2016). AFC later amended its 2016 12-Day Pre-General Election Report to disclose additional disbursements of \$95,094.32. AFC Amended 2016 12-Day Pre-General Election Rpt. at 2 (Mar. 17, 2017).

4. AFC filed its 2016 30-Day Post-General Election Report on December 8, 2016, reporting total disbursements of \$660,628. AFC 2016 30-Day Post-General Election Rpt. at 2 (Dec. 8, 2016). AFC later amended its 2016 30-Day Post-General Election Report to disclose additional disbursements of \$278,435.82. AFC Amended 2016 30-Day Post-General Election Rpt. at 2, 5 (Mar. 22, 2017).

V. AFC violated 52 U.S.C. § 30104(b) by failing to disclose disbursements of \$95,094.32 on its 2016 12-Day Pre-General Election Report and disbursements of \$278,435.82 on its 2016 30-Day Post-General Election Report — an aggregate total of \$373,530.14 in increased activity.

VI. 1. AFC will pay a civil penalty to the Commission in the amount of fourteen thousand five hundred dollars (\$14,500), pursuant to 52 U.S.C. § 30109(a)(5)(A).

2. AFC will cease and desist from committing violations of 52 U.S.C. § 30104(b).

VII. The Commission, on request of anyone filing a complaint under 52 U.S.C. § 30109(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

VIII. This agreement shall become effective as of the date that all parties hereto have executed the same and the Commission has approved the entire agreement.

IX. AFC shall have no more than forty-five (45) days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

X. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written or oral, made by either party or by agents of either party, that is not contained within this written agreement shall be enforceable.

FOR THE COMMISSION:

Lisa J. Stevenson  
Acting General Counsel

BY: Kathleen M. Guith  
Kathleen M. Guith  
Associate General Counsel for Enforcement

6-5-18  
Date

FOR THE RESPONDENTS:

  
Douglas L. Applegate

May 9, 2018